Jay B. Kasner (JK-7910) Joseph N. Sacca (JS-9435) SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP Four Times Square New York, New York 10036 (212) 735-3000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CONVERIUM HOLDING AG,

07 Civ. 3042 (GEL)

Plaintiff,

- against -

SCOR S.A. AND PATINEX A.G.,

Defendants.

DECLARATION OF JOSEPH N. SACCA IN OPPOSITION TO PLAINTIFF'S MOTION FOR EXPEDITED SCHEDULING AND DISCOVERY

I, Joseph N. Sacca, pursuant to 28 U.S.C. § 1746, declare as follows:

- 1. I am a member of the Bar of this Court and of Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for defendant SCOR S.A. in the above-captioned matter.
- 2. I submit this declaration in opposition to Plaintiff's Motion For Expedited Scheduling and Discovery, and to place before the Court true and correct copies of the following documents:

Exhibit A: Converium Holding AG 13D, filed on February 21, 2007.

Exhibit B: SCOR Pre-Announcement Press Release, dated February 26, 2007.

Exhibit C: Wilkie Farr & Gallagher LLP Memorandum submitted to Swiss Takeover

Board, dated March 5, 2007.

Exhibit D: Wilkie Farr & Gallagher LLP Memorandum submitted to Swiss Takeover

Board, dated March 20, 2007.

Exhibit E: Wilkie Farr & Gallagher LLP Memorandum submitted to Swiss Takeover

Board, dated March 28, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York April 19, 2007

Joseph N. Sacca